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March 31, 2025

**VIA ECF**

The Honorable Ona T. Wang  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, 10007

Re: Yitzhak, et. al. v. Verner, et. al., Southern District of New York  
Case No.: 1:23-cv-02084

Dear Judge Wang:

Our firm represents Defendants Paul William Verner, Verner and Simon LLP, Verner and Simon, Verner and Simon, P.C. with respect to the above referenced case. We write to apprise the Court of the current status of discovery in the above-referenced matter.

As an initial matter, we received Plaintiff's discovery responses and production earlier this month. The undersigned was out of the country from March 13<sup>th</sup> through March 24<sup>th</sup> and Ms. Song communicated with Mr. Weinstein during this time and advised that we would get back to him upon my return.

On March 28, 2025, the parties met and conferred pursuant to the Court's directives. During this conference, we reached an amicable agreement that, upon obtaining our client's availability, we would exchange a joint proposed status letter to be filed with the Court as ordered. Regrettably, at 12:52 PM today, Mr. Weinstein insisted that we respond immediately, asserting that the day was nearly over. While we responded promptly, as we consistently do, he filed his letter while we were in the process of obtaining our client's availability who is currently on the west coast.

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Regardless, we are prepared to address discovery and deposition dates with the Court on April 3, 2025 and we look forward to establishing further discovery deadlines.

We thank the court for its consideration.

Respectfully submitted,

*/s/ Erin O'Leary*

Erin O'Leary for  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Respectfully submitted,

*/s/ Grace Song*

Grace Song for  
LEWIS BRISBOIS BISGAARD & SMITH LLP

EO/GS